

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>CAROL KULIG</b>	)	<b>No. Civ. 13-cv-04715-PKC</b>
<i>on behalf of herself and all others similarly ) situated</i>	)	
<b>Plaintiff</b>	)	
	)	
<b>-v.-</b>	)	
<b>MIDLAND FUNDING, LLC,</b>	)	
<b>MIDLAND CREDIT MANAGEMENT, INC.</b>	)	
<b>ENCORE CAPITAL GROUP, INC.</b>	)	
<b>f/k/a MCM CAPITAL GROUP, INC.</b>	)	
<b>AMANDA PEREZ</b>	)	
<b>Defendants</b>	)	
-----X		

**Plaintiff's Motion for Substitution of Counsel**

PLEASE TAKE NOTICE that, upon the annexed declaration of Ahmad Keshavarz, Esq., dated December 20, 2014, and the exhibit attached thereto, Plaintiff, by counsel, moves under Local Civil Rule 1.4 that this Court substitute Brian L. Bromberg as counsel of record for Plaintiff Carol Kulig, in place of Ahmad Keshavarz.

Dated: Brooklyn, New York  
December 20, 2014

Respectfully submitted,  
/s/  
Ahmad Keshavarz  
THE LAW OFFICES OF AHMAD KESHAVARZ  
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Brooklyn, NY 11241-1026  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this day I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Defendants

MIDLAND FUNDING, LLC;

MIDLAND CREDIT MANAGEMENT, INC.;

ENCORE CAPITAL GROUP, INC; and

AMANDA PEREZ

By and through their attorneys of record

Kevin P. Wallace

Karen F. Lederer

Timothy St. George

Troutman & Sanders, LLP

The Chrysler Building

405 Lexington Avenue

New York, NY 10174

I further certify that on this day I served the above referenced document to the party listed below via postal mail:

Carol Kulig

820 West End Ave., Apt. 14B

New York, NY 10025

Date: December 20, 2014

Brooklyn, NY

/s/

Ahmad Keshavarz

Plaintiff's Attorney